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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Richard Klein and Raymond Urias, individually  
and on behalf of all others similarly situated,

Plaintiffs,  
vs.

National Collegiate Student Loan Trust 2005-3,  
National Collegiate Student Loan Trust 2006-3,  
National Collegiate Student Loan Trust 2007-1,  
National Collegiate Student Loan Trust 2007-2,  
National Collegiate Student Loan Trust 2007-3,  
National Collegiate Student Loan Trust 2007-4,  
Pennsylvania Higher Education Assistance

Case No.: 2:22-cv-01392-GMN-BNW

**JOINT MOTION TO EXTEND  
DEADLINE TO RESPOND TO  
PLAINTIFFS' FIRST AMENDED  
COMPLAINT (FIRST REQUEST)**

1 Agency d/b/a American Education Services;  
2 and Transworld Systems, Inc.

3 Defendants.

4 Plaintiffs, Richard Klein and Raymond Urias (“Plaintiffs”), and Defendants, Attorneys for  
5 National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-3,  
6 National Collegiate Student Loan Trust 2007-1, National Collegiate Student Loan Trust 2007-2,  
7 National Collegiate Student Loan Trust 2007-3, and National Collegiate Student Loan Trust 2007-  
8 4 (“Defendants”) (collectively “Parties”), by and through their counsel of record, hereby stipulate  
9 and agree as follows:

10 On August 26, 2022, Plaintiffs filed their Complaint [ECF No. 1]. Defendants were served  
11 with Plaintiffs’ Complaint on September 19, 2022. The deadline for Defendants to respond to  
12 Plaintiffs’ Complaint was October 11, 2022. After a joint motion of the parties, the Court extended  
13 the deadline for Defendants to respond to Plaintiffs’ Complaint to November 9, 2022 [ECF No.  
14 8]. Thereafter, Defendants filed a Motion to Dismiss on November 9, 2022 [ECF No. 12]. The  
15 parties then stipulated to extend the time for Plaintiffs to Respond to the Motion to Dismiss to  
16 December 23, 2022 [ECF No. 18], and the Court entered an Order to that effect [ECF No. 19]. On  
17 December 23, 2022, Plaintiffs filed their First Amended Complaint [ECF No. 20].

18 The Parties have discussed extending the deadline for Defendants to respond to Plaintiffs’  
19 First Amended Complaint to allow for better investigation of new allegations.

20 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendants  
21 to file their responsive pleading to Plaintiffs’ First Amended Complaint to February 6, 2023. The  
22 parties further agree that the stipulation regarding discovery as set forth in ECF No. 19 remain in  
23 effect and are unaffected by this stipulation.

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1 This is the first motion for an extension of time for Defendants to file their responsive  
 2 pleading to the First Amended Complaint. The extension is requested in good faith and is not for  
 3 purposes of delay or prejudice to any other party.

4 DATED this 30th day of December, 2022.

5 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

6 /s/ Ramir M. Hernandez

/s/ George Haines

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*Attorneys for Plaintiffs, Richard Klein and*

11 *Collegiate Student Loan Trust 2005-3,*

*Raymond Urias*

12 *National Collegiate Student Loan Trust*

2006-3, National Collegiate Student Loan

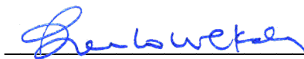
13 Trust 2007-1, National Collegiate Student

Loan Trust 2007-2, National Collegiate

14 Student Loan Trust 2007-3, and National

*Collegiate Student Loan Trust 2007-4*

15 IT IS SO ORDERED:

16 

17 UNITED STATES DISTRICT COURT  
 18 JUDGE

19 DATED: January 3, 2023

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT (FIRST REQUEST)** on the 30th day of December, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP